

EXHIBIT 11

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Dawn Brenner and Kathy Brenner, as co-trustees for the heirs and next of kin of Dylan Brenner,

Court File No.: 18-cv-02383 (NEB/ECW)

Plaintiffs,

vs.

**MEND DEFENDANTS' ANSWER TO
PLAINTIFFS' INTERROGATORY
NO. 14 PURSUANT TO COURT'S
ORDER ON PLAINTIFFS' SECOND
MOTION TO COMPEL**

Danielle Sue Asfeld, in her individual capacity, Amanda Nowell, in her individual capacity, Christina Leonard, in her individual capacity, Janell Hussain, in her individual capacity, Todd Leonard, in his individual and official capacities, Rebecca Lucar, in her individual capacity, Denny Russel, in his individual capacity, Wes Graves, in his individual capacity, James Rourke, in his individual capacity, MEnD Correctional Care, PLLC, and Sherburne County,

Defendants.

TO: Plaintiffs Dawn Brenner and Kathy Brenner, as co-trustees for the heirs and next of kin of Dylan Brenner, and their counsel of record:

Jeffrey S. Storms, Paul C. Dworak, NEWMARK STORMS DWORAK LLC, 100 South Fifth Street, Suite 2100, Minneapolis, Minnesota 55402; and

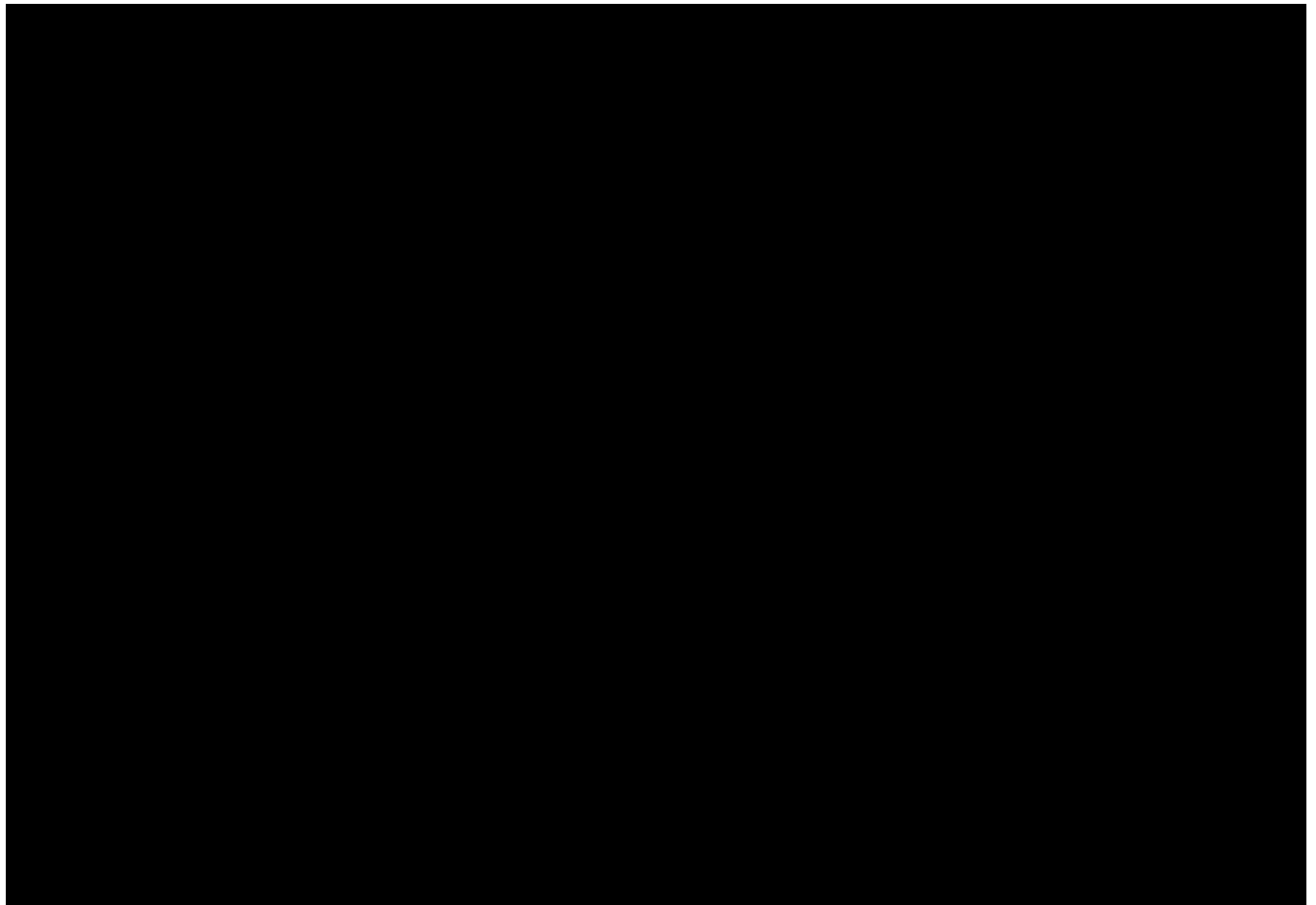
Jeffrey M. Montpetit, SIEBENCAREY, P.A., 901 Marquette Avenue, Suite 500, Minneapolis, Minnesota 55402.

NOW COME Defendants Danielle Sue Asfeld, Amanda Nowell, Christina Leonard, Janell Hussain, Todd Leonard, M.D., and MEnD Correctional Care, PLLC, ("MEnD Defendants"), for their Supplemental Response to Plaintiffs' Interrogatory No. 14,

pursuant to the Court's Order of March 6, 2020, regarding Plaintiffs' Second Motion to Compel Discovery.

INTERROGATORY NO. 14. Identify all inmates who have committed suicide while incarcerated at prisons, jails, or other detention facilities, where MEnD provided health care services to inmates.

ANSWER: Those inmates who have committed suicide since 2012 while incarcerated in facilities where MEnD provides or provided health care services to inmates/detainees are listed below.



For purposes of the responses to documents regarding these deaths, I further attest to the following:



MEnD requested medical records regarding Lance Novak, but was advised the county is unable to locate them.

[REDACTED]

The majority of counties with which MEnD contracts do not use electronic medical records systems and there is not a single EMR system utilized in those counties that do (e.g., Sherburne County is the only county that uses eMDs).

MEnD Quarterly Reports are being produced for each quarter in which a suicide occurred, as noted above. However, we are unable to locate the 2014 third quarter report for Stearns County.

Some facilities with which MEnD contracts create “Serious Injury Reports,” but MEnD does not create, maintain, or keep copies of those reports.

MEnD does not create or maintain inmate jail records, and the records are not in MEnD’s custody or control. Any jail records in MEnD’s possession would be included in the inmate’s medical record, if any. Thus, the medical records being produced contain the extent of those jail records in MEnD’s possession regarding the inmate suicides identified above.

MEnD has not created any inspection or investigation records regarding suicides as listed above, nor does it have any inspection or investigation records from other entities (e.g., jail facilities or DOC) in its possession.

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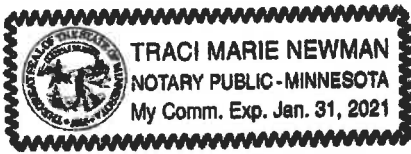
ACKNOWLEDGEMENT

I, Todd Leonard, M.D., being duly sworn, state that I am the current President of MEnD Correctional Care, PLLC, and, as such, I am authorized to execute this Supplemental Answer to Plaintiffs' Interrogatory No. 14. The information provided in this Answer is based upon my personal knowledge as well as ascertained and derived from the business files and records of MEnD Correctional Care.

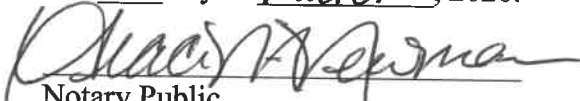
Dated: March 20, 2020

MEnD CORRECTIONAL CARE, PLLC

By: 



Subscribed and sworn to before me
this 20th day of March, 2020.


Notary Public

AS TO FORM AND OBJECTIONS:

Date: March 20, 2020

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